

40 WALL STREET • 40<sup>TH</sup> FLOOR • NEW YORK, NY 10005 tel. (212) 947-4999 • fax. (212) 947-8099 • www.cmmattorneys.com

July 27, 2016

## VIA ECF

Hon. Nina Gershon United States District Court 225 Cadman Plaza East Brooklyn, New York 11201

Re: Matthew McDermott v. National Herald, Inc. Civil Action No. 1:16-cv-1697

Dear Judge Gershon:

We represent the defendant National Herald, Inc. in the above-captioned action. Please accept this letter pursuant to the Court's scheduling order as set forth on July 13, 2016.

We respectfully request that this Honorable Court mark our previously filed letter dated May 20, 2016, submit as our Motion seeking that the Court Vacate the Certificate of Default entered by the Clerk of the Court on May 18, 2016.

The Defendant respectfully request that the Court vacate the entry of default and accept the defendants answer thus allowing this case to be decided on the merits.

Respectfully Submitted,

CAMAÇHO MAURO MULHOLLAND, LLP

James J. Walsh III, Esq.

JJW/bm

z:\cases\4141\lgl\letter to court 07.26.16.doc